



MOSKOWITZ & BOOK, LLP

Avraham C. Moskowitz  
AMoskowitz@mb-llp.com

345 Seventh Avenue, 21<sup>st</sup> Floor  
New York, NY 10001  
Phone: (212) 221-7999  
Fax: (212) 398-8835

January 20, 2020

**By ECF**

Hon. P. Kevin Castel  
U.S. District Judge  
U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Application Granted. The final pretrial conference originally scheduled for January 27, 2021 is adjourned to February 12, 2021 at 12:00 p.m. Time is excluded under the speedy trial act until 2/12/21 for the reasons set forth in defense letter dated January 20, 2021.

SO ORDERED.

Dated: 1/22/2021

P. Kevin Castel

United States District Judge

Re: United States v. Geovanny Fuentes Ramirez  
S6 15 Cr. 379 (PKC)

Dear Judge Castel:

This letter is respectfully submitted on behalf of the defendant, Geovanny Fuentes Ramirez, to request a short extension of the deadline for responding to the Government's motion *in limine*. The current deadline for the defendant's response is January 22, 2021. The additional time is needed so that counsel can consult with the defendant about the defense response to the Government's motion. Counsel was scheduled to meet with Mr. Fuentes Ramirez on Thursday, January 21, but that meeting was cancelled because of the recently imposed lockdown at the MCC. I am scheduled to speak with Mr. Fuentes Ramirez on Friday evening, January 22, and my co-counsel, Mr. Schulman, is attempting to schedule a meeting with the defendant for early next week, in the hope that the lockdown will have ended, to review the proposed response to the Government's motion with him. Accordingly, it is respectfully requested that the Court extend the date by which the defense response to the Government's motion *in limine* is due to January 27, 2021. Hopefully, by that date, counsel will have had sufficient time to consult with the defendant about the issues raised by the Government's motion and will be able to submit a response that properly reflects the defendant's input. The parties understand that granting such an extension will likely result in adjourning the final pretrial conference currently scheduled for January 27.

I have discussed this request with AUSA Laroche who advised that the Government has no objection to the requested extension.

Thank you in advance for your consideration of this request.

Respectfully submitted,

Avraham C. Moskowitz

cc: All counsel of record (by ECF)